

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE UNITED STATES OF AMERICA,

v.

KURT WALTER,

Defendant

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) Criminal No. 03-10370-DPW
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**DEFENDANT KURT WALTER'S MOTION FOR EXTENSION OF TIME
TO FILE MOTIONS**

Defendant, by his attorney, hereby moves this Court to grant him an additional sixty (60) days within which to file dispositive motions for the following reasons:

1. This is a complex case alleging a large drug distribution network involving eight co-defendants.

2. This discovery is voluminous, consisting of over 5,000 pages of materials. Much of the evidence in the case is the result of numerous wiretaps conducted pursuant to court authorization.

3. The undersigned has not yet had an opportunity to review all of this material and to review the recordings and transcripts of the various wiretaps.

4. Several of the co-defendants in this case have also requested extensions of time within which to file motions, and counsel are attempting to coordinate their efforts.

5. Assistant United States Attorney Rachel Hershfang has no objection to this request.

WHEREFORE, defendant prays that this Court grant him an extension of sixty (60) days within which to file motions.

Respectfully submitted,

/s/ William J. Cintolo
William J. Cintolo (BBO #084120)
Cosgrove, Eisenberg and Kiley, P.C.
One International Place
Boston, MA 02110
(617) 439-7775

Dated: September 21, 2004